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VIA ECF

The Honorable Judge Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: FTS Capital, LLC v. Stuyvesant Construction Corp. et al
Docket No. 19-CV-7275 (DLI) (CLP)

Dear Honorable Judge Merkl:

My office represents FTS Capital, LLC, in the above-referenced action. Currently, there is a trial scheduled for December 3, 2024, before your Honor. This letter is submitted to request that Plaintiff be allowed to produce its two non-party witnesses virtually. Both of Plaintiff's non-party witnesses are out-of-state and the cost to fly both witnesses and provide accommodations is excessive for Plaintiff. Should the request be granted, it would ease the financial burden on Plaintiff, and allow Plaintiff to produce the non-party witnesses without pushback from them.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/Rafi Hasbani
Rafi Hasbani, Esq.